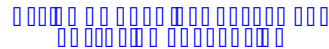




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D.C., 20460



PC Code: 044309
DP Barcode: 371021

MEMORANDUM

DATE: December 2, 2010

SUBJECT: EFED Review of submitted study: Bee Health Monitoring in Switzerland

TO: Kable Davis, Risk Manager Reviewer
Venus Eagle, Risk Manager
Insecticide Branch
Registration Division (7505 P)

FROM: Christina deMariano, Biologist
Environmental Risk Branch 5
Environmental Fate and Effects Division (7507 P)

THRU: Mah Shamim, Branch Chief
Environmental Risk Branch 5
Environmental Fate and Effects Division (7507P)

EFED has reviewed the following study submitted for Clothiandin

MRID 47881701. Federal Office of Agriculture (FOAG), (2009) Bee Health Monitoring in Switzerland: Clothianidin. Project Number: G202097. Unpublished study by Bayer CropScience. 15 p.

The completed data evaluation records review document for this study is attached. The study regarding bee health and neonicotinoid use is scientifically sound but is deficient due to lack of any interaction between honeybees and maize plants experiencing guttation. Also, only 36% of the field was sown with seeds treated with Poncho. No deleterious effects were documented; this could be due to lack of exposure. It is classified as supplemental because no control hives were established and monitored during the time frame of experimentation.